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February 4, 2009

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

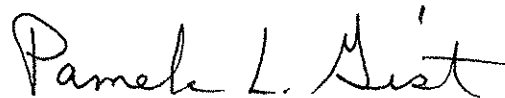
Re: EB Docket No. 06-36  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

Dear Ms. Dortch:

On behalf of Skyline Telephone Membership Corporation and SkyBest Communications, Inc., and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carriers' joint 2008 CPNI certification with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosure

cc: Best Copy and Printing, Inc. (1)



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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Name of companies covered by this certification:

SkyBest Telephone Membership Corporation  
Form 499 Filer ID 802392

SkyBest Communications, Inc.  
Form 499 Filer ID 821108

**CERTIFICATION**

I, Michael D. Lewis, hereby certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the companies' procedures ensure that the companies are in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the companies regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.

A handwritten signature in cursive script that reads "Michael D. Lewis".

Name: Michael D. Lewis  
Title: Chief Regulatory Officer  
Date: February 2, 2009

Company Names (Collectively referred to as "Carrier"):

SkyBest Telephone Membership Corporation  
SkyBest Communications, Inc.

#### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier provides training for employees and individual training for new employees. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No actions taken.
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: No complaints received
  - Category of complaint:
    - 0 Number of instances of improper access by employees
    - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
    - 0 Number of instances of improper access to online information by individuals not authorized to view the information
    - 0 Number of other instances of improper access or disclosure
  - Summary of customer complaints received in 2008 concerning the unauthorized release of CPNI: Not Applicable